

SOIL MANAGEMENT PLAN

PARCEL
47-31-401-008

FLINT, GENESEE COUNTY, MICHIGAN 48505

APRIL 26, 2023

PREPARED FOR:
**ASHLEY CAPITAL, LLC,
AND FLINT COMMERCE CENTER, LLC**
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CANTON, MICHIGAN 48188



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1.0 INTRODUCTION AND PURPOSE

The Soil Management Plan (hereafter referred to as “SMP”) was prepared on behalf of Flint Commerce Center, LLC (FCC), for Parcel number 47-31-401-008 (i.e., Block 2 through 4), approximately 150 acres in size, located north of Leith Street, south of East Stewart Avenue, east of Industrial Avenue, and west of the CSX railroad in Flint, Genesee County, Michigan (hereafter referenced as the “Site”; and depicted in Figure 1). The SMP was developed as a companion with the Concrete Razing, Crushing, and Reuse (CRCR) Plan and the Infiltration Plan prepared by Arcadis. The Site history, summary of existing agreements and background has been presented in those plans.

FCC plans to prepare the Site for redevelopment by razing the surface concrete slabs and pavements and removing the former building foundations and utilities. As outlined in the CRCR Plan, the concrete will be crushed, processed, and reused on the Site as fill and FCC will comply with the expected land use restrictions during this process. The SMP presents how FCC propose to manage and move contaminated soils during the earthwork/grading portion of the redevelopment and discussed in the following sections.

In the context of this SMP, clean material will be material that is not contaminated above relevant Part 201 nonresidential criteria for the direct contact or inhalation pathways or with PCBs above 1 part per million (ppm). In each distinct Infiltration Reduction Zone (IRZ) (see Section 2.1) or area, the interim soil cover will be placed within nine months of removing the slabs, foundations, or pavements. Relocation of soil as discussed in the following sections, if needed, would occur following slab removal and prior to placement of the interim soil covers. During future phases of the development, the interim soil cover will be replaced with either pavement, buildings, or landscaping. Landscaped areas will be designed to incorporate the same minimum cover for the respective zones or areas as noted in the CRCR Plan.

2.0 SUMMARY OF SOIL MANAGEMENT AREAS

Various environmental studies have been conducted at the Site since 2000. The soil contamination has been divided into various areas based on the type of contamination and the regulatory context of that contamination. Concrete slab, foundation, pavement removals, utility removals, and site grading activities will require soil to be disturbed and possibly moved from its current in-situ location. The soil and groundwater contamination will be managed following guidance from RCRA/Part 111, TSCA obligations and Part 201 and the requirements of current and future restrictive covenants. The soil management protocols for the specific designated contaminated areas are summarized in the following subsections. See Figure 2 for the graphical illustration of the different soil management areas.

2.1 Infiltration Reduction Zones (IRZs)

The IRZs are areas were identified to have either significant PFAS contamination, soil contamination above Part 201 nonresidential ambient air inhalation criteria, or areas with unprotected storm sewers. During either removal or grading activities, soil located within an IRZ can be freely relocated within the boundaries of that specific IRZ, but not moved to a different IRZ. Contaminated on-site soil from outside of the IRZs will not be relocated to the IRZs unless it is outside the other designated contaminated areas and is representatively sampled and documented not to be contaminated with PFAS above Part 201 criteria. The interim and/or final cover for the IRZs as described in the CRCR Plan will be placed and maintained after soil relocation activities and those activities will be documented as required by Part 201(20c).

2.2 TSCA Regulated PCB Areas

The TSCA regulated PCB contamination areas (PCB areas) are those with PCB contamination above 1 ppm. During either removal or grading activities, contaminated on-site soil from the PCB areas can be freely relocated within the

boundaries of that specific PCB area or to a PCB area with greater PCB contamination, but not moved to a different PCB area with lesser PCB contamination. Contaminated on-site soil from outside of the PCB areas will not be relocated to the PCB areas unless it is outside the other designated contaminated areas and is representatively sampled and documented not to be contaminated with PCBs above one ppm. The interim and/or final cover for the PCB areas as described in the CRCR Plan will be placed and maintained after soil relocation activities and those activities will be documented as required by Part 201(20c) and TSCA.

2.3 Other Soil Contamination Areas

The other soil contamination areas were identified with soil contamination above Part 201 nonresidential direct contact (DC) and/or particulate soil inhalation (PSIC) criteria, LNAPL contamination, or hazardous waste levels. The areas with hazardous waste contamination will be placed in AOCs. The soil management protocols for each of these subareas are summarized in the following subsections.

2.3.1 Soil Contamination above Part 201 Nonresidential DC (Not Hazardous Waste) or PSIC Criteria

During either removal or grading activities, contaminated on-site soil from these areas can be freely relocated within their boundaries or to a different area in the same category of contamination because they are similarly contaminated and restricted by the Restrictive Covenants (RC). Contaminated on-site soil from outside of any other designated contaminated area can be moved into these areas without additional testing. The interim and/or final cover for these areas as described in the CRCR Plan will be placed and maintained after soil relocation activities and those activities will be documented as required by Part 201(20c). The potential for dust generation in the PSIC contamination areas will be monitored and managed with light watering during the removals, rough grading activities, and placement of the interim cover.

2.3.2 LNAPL Contaminated Areas

During either removal or grading activities, contaminated on-site soil from the LNAPL areas can be freely relocated within their boundaries or to a different LNAPL area because they are similarly contaminated and restricted by RCs. Contaminated on-site soil from outside of any other designated contaminated area can be moved into these areas without additional testing. The interim and/or final cover as described in the CRCR Plan for the LNAPL areas will be placed and maintained after soil relocation activities and those activities will be documented as required by Part 201(20c).

2.3.3 Hazardous Waste Areas Managed by AOC

The AOC policy allows the management of contamination within the AOC without triggering the waste disposal provisions of RCRA. During either removal or grading activities, contaminated on-site soil from the AOC areas can be freely relocated within the boundaries of that specific AOC area, but not moved outside of that specific AOC area. Contaminated on-site soil from outside of designated areas can be relocated to the AOC areas without additional testing. The interim and/or final cover for the AOC areas as described in the CRCR Plan will be placed and maintained after soil relocation activities and those activities will be documented as required by Part 201(20c).

2.4 Areas Not in a Designated Contaminated Area

During either removal or grading activities, contaminated on-site soil from outside of the designated contaminated areas can be freely moved on the site provided the soil remains outside of the designated contaminated areas or complies with the requirements for the specific areas as noted in Sections 2.1, 2.2, and 2.3. Per the CRCR Plan, these

areas do not require interim or permanent cover. Soil relocation activities will be documented as required by Part 201(20c).

3.0 REFERENCES

The following references were reviewed in the process of preparing the SMP:

Arcadis 2016, Final Draft - RACER Buick City Remedy Recommendation Report Buick City Site, Flint, Michigan August 29, 2014, Revised February 15, 2016

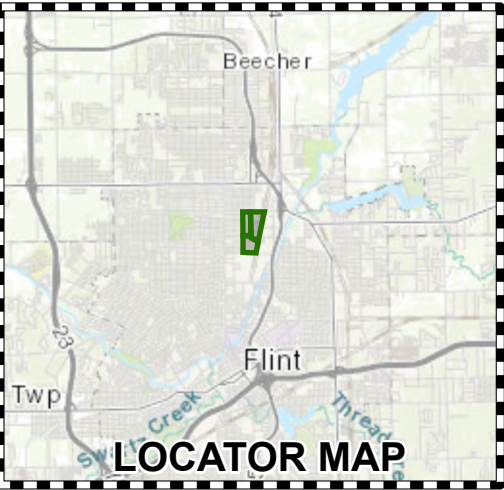
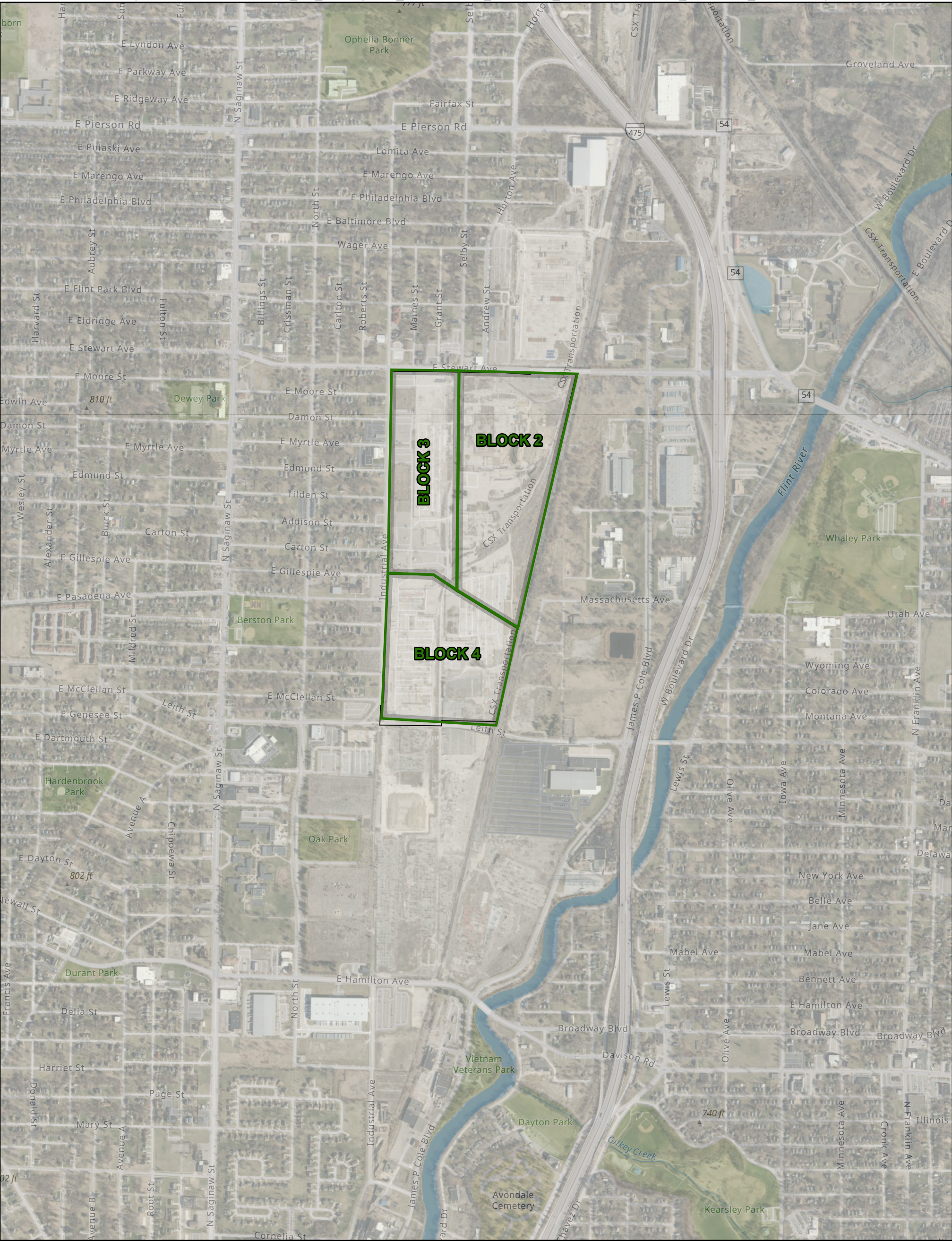
Arcadis 2023, Infiltration Management and Generic LNAPL and PFAS Soil Management Plan - RACER Buick City, Flint, Michigan, April 18, 2023

Mannik & Smith Group 2023, Concrete Razing, Crushing and Reuse Plan, Parcel 47-31-401-008, Flint, Michigan, April 19, 2023.

Racer Trust, 2023, Draft Declaration of Restrictive Covenant, Buick City – Part 111 and RCRA Issues, EGLE Reference No. RC-OWMRP-111-23-001, Facility MID Number MID 005 356 712 and MIT 270 010 044 , April 18, 2023

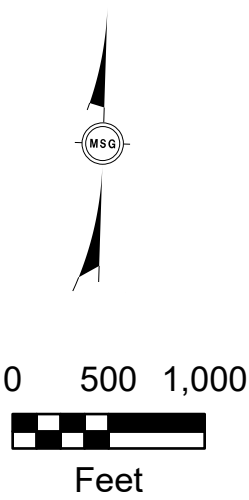
FIGURES






Legend

- Approximate Block Boundary
- Parcel: 47-31-401-008





TECHNICAL SKILL.
CREATIVE SPIRIT.

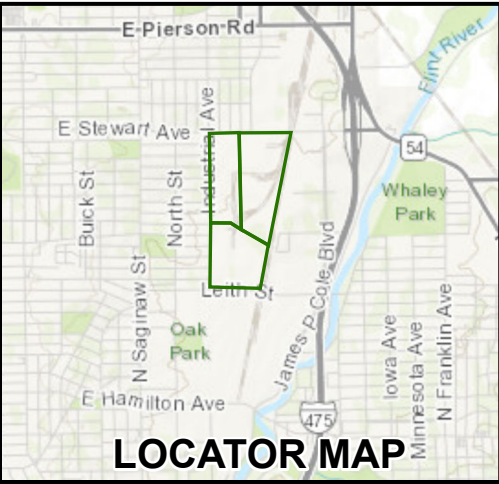
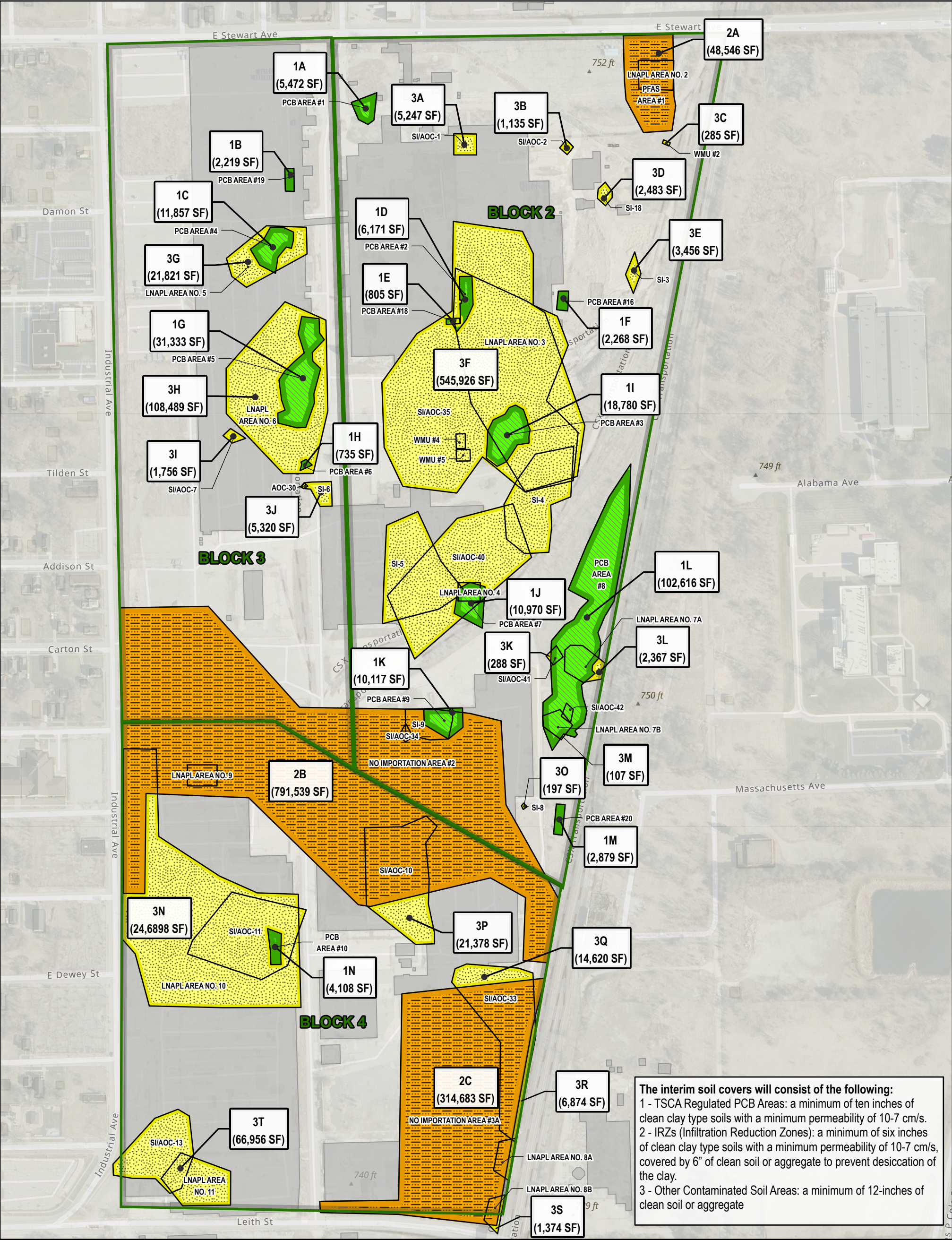
www.MannikSmithGroup.com

FIGURE 1

SITE LOCATION MAP

Buick City
Flint, Genesee County, Michigan

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Interim Soil Cover Type Category

- 1 - TSCA Regulated
- 2 - IRZs
- 3 - Other

Approximate Block Boundary

Former Building Concrete Floors

Restrictive Covenant Area

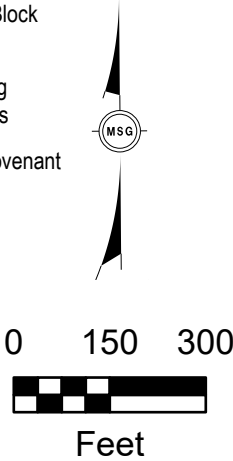


FIGURE 2
BLOCKS 2, 3 AND 4
INTERIM SOIL COVER

Buick City
Flint, Genesee County, Michigan

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